

BAKER & HOSTETLER LLP

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Settlement Date: October 13, 2021

Time: 12:00 p.m.

Objections Due: October 12, 2021

Time: 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES,
LLC,

Defendant.

In re:

BERNARD L. MADOFF INVESTMENT SECURITIES
LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE GERALD AND BARBARA KELLER FAMILY
TRUST, GERALD E. KELLER, individually and in his
capacity as Trustee of the Gerald and Barbara Keller Family
Trust, BARBARA KELLER, individually and in her
capacity as Trustee of the Gerald and Barbara Keller Family
Trust,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04539 (CGM)

NOTICE OF PROPOSED ORDER IMPLEMENTING JUDGMENT

PLEASE TAKE NOTICE that pursuant to the Memorandum Decision Granting Trustee's
Motion for Summary Judgment and Denying Defendants' Cross Motion for Summary Judgment
(the "Decision") dated September 30, 2021, and in accordance with Local Bankruptcy Rule 9074-

1(a), Irving H. Picard, the Trustee, through his undersigned counsel, will present the proposed judgment and the Decision, attached hereto as **Exhibits 1 and 2**, respectively, to the Honorable Cecelia G. Morris, Chief United States Bankruptcy Judge, for settlement and signature in her chambers located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on October 13, 2021, at 12:00 p.m..

PLEASE TAKE FURTHER NOTICE that to the extent there is a counter-proposed judgment or objection to the proposed judgment, it must be in writing, and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, in by no later than October 12, 2021 at 5:00 p.m. (the “Objection Deadline”), with a courtesy copy delivered to the Chambers of the Honorable Cecelia G. Morris and served upon (a) Baker and Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan and Nicholas J. Cremona, and (b) Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington D.C. 20006-1620, Attn: Kevin H. Bell. Any objections to the proposed judgment must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection. Unless a counter-proposed judgment or written objection to the proposed judgment is received before the Objection Deadline, the proposed judgment may be signed and entered by the Court without further notice.

Dated: New York, New York
October 11, 2021

BAKER & HOSTETLER LLP

Of Counsel:

BAKER HOSTETLER LLP

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By: /s/ Nicholas J. Cremona

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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*